

January 27, 2010

VIA FACSIMILE

The Honorable Jed S. Rakoff
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10022

Re: SEC v. Galleon Management, LP, et al., 09 Civ.8811 (JSR)

Dear Judge Rakoff:

Our client, Craig C. Drimal, is a defendant in Sec v. Cutillo, et al., 09 Civ. 9208 (LAK). Defendants Zvi Goffer, Gautham Shankar, and David Plate are co-defendants of Mr. Drimal in that matter. Mr. Drimal and the aforementioned co-defendants also have been charged criminally in US v. Goffer, et al., 10 Crim. 56 (RJS).

We write concerning the request that is before your honor for an Order to allow the SEC to obtain certain wiretap material in civil discovery in the instant case. The government has indicated that Mr. Drimal was a party to some of the wiretap intercepts that are the subject of the SEC's request here. To the extent that Mr. Drimal's communications are on the intercepts, he comes within the definition of an "aggrieved person" in Title III, 18 U.S.C. § 2510(11).

On behalf of Mr. Drimal, we join in the arguments presented on behalf of the defendants opposing the SEC's request for discovery of the wiretap materials. The government has not provided Mr. Drimal with the content of any communications captured in connection with the wiretaps at issue here or with any line sheets or transcripts of such communications.

Mr. Drimal wishes to reserve all of his legal and procedural rights relating to the wiretap materials that are the subject any ruling of the Court.

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Should your honor issue the Order that the SEC seeks, Mr. Drimal requests that the Court order the government to provide to him all of the wiretap materials that the defendants must produce to the SEC.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Abbe R. Tiger". The signature is fluid and cursive, with the first name "Abbe" written in a larger, more prominent script than the last name "Tiger".

Abbe R. Tiger and
On behalf of co-counsel
JaneAnne Murray